

## **DECLARATION OF EDWIN CHAPUSEAUX**

I, Edwin Chapuseaux, declare the following:

### **Agent's Background**

1. I am a Task Force Officer with the Federal Bureau of Investigation, deputized as a Special Deputy U.S. Marshal of the United States Department of Justice. I am assigned to the FBI Houston Office. I have been a Task Force Officer since January of 2005 and a Harris County Sheriff's Deputy since December of 1991. My duties are those of Investigator and Law Enforcement Liaison for the Human Trafficking Rescue Alliance (HTRA), the Harris County Task Force that investigates Human Trafficking cases in the Southern District of Texas.

### **Investigation and Trial**

2. I was involved in the investigation of Hortencia Medeles-Arguello, also known as Raquel Medeles Garcia and Tencha ("Tencha"). I have reviewed documents and other evidence obtained during the investigation and have participated in interviews of confidential informants, cooperating defendants, victims, and witnesses.
3. This declaration is based upon my personal knowledge, my law enforcement experience and training, my review of documents and other evidence, and information from other law enforcement personnel, witnesses, victims,

cooperating defendants, and confidential informants whom I believe to be reliable and credible.

4. The investigation revealed that from at least 1999 until October 2013, Tencha operated brothels in Houston, Texas, where illegal aliens were harbored, concealed and shielded from law enforcement detection and where females (including minors) were provided for commercial sex acts.
5. In October 2013, Tencha and several others were charged by federal indictment with a sex trafficking conspiracy in violation of 18 U.S.C. §§ 1591 and 1594(c), a conspiracy to harbor illegal aliens in violation of 8 U.S.C. § 1324(a), and a conspiracy to commit money laundering in violation of 18 U.S.C. § 1956(h). All of Tencha's co-defendants charged in this case (except for a fugitive) pleaded guilty to certain offenses.
6. Following a trial in April 2015, a jury found Tencha guilty of all counts charged in a Superseding Criminal Indictment, including a sex trafficking conspiracy beginning in or about January 2009 and continuing until October 2013, a conspiracy to harbor illegal aliens from in or about August 1999 to October 2013, three counts of money laundering, and a money laundering conspiracy beginning on or about September 15, 2011 and continuing through in or around November 7, 2011.

7. During the course of the trial, several witnesses testified about the cash generated at Las Palmas II, including cover or entrance charges and fees for the use of prostitution rooms and for condoms. Government's Exhibit 39, which was prepared based upon documents provided by an individual employed at Las Palmas II, shows that these fees alone generated \$1,607,400.00 from February 15, 2012 through August 26, 2013 and that the prostitution rooms were used more than 64,000 times during this time period. Exhibit 39 does not take into account all of the fees received during this time period because it only reflects money that Juan Carlos Munoz collected for the brothel while he was working. For instance, on nights when someone other than him collected the cash for condoms, he did not account for that cash and it was not included on Exhibit 39. There was also testimony at trial that the prostitutes had to pay certain fees to Las Palmas II, including fees for being late to work, missing work, leaving early, engaging in sex acts at a hotel instead of Las Palmas II, and for Saturday cleaning.
8. Furthermore, the brothels generated cash throughout the course of the alien harboring and sex trafficking conspiracies for which Tencha was convicted and, during the investigation, I learned that the business was more profitable in earlier years, including as far back as 1999, and that the business had

actually slowed, as police activity increased, during the time period captured in Exhibit 39.

### **Seized Cash**

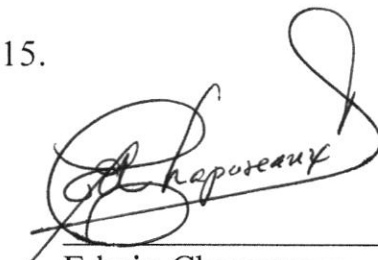
9. On October 10, 2013, a federal search warrant was executed at Las Palmas II (also known as Nuevo Amanecer), one of the brothels operated by Tencha, which is located at 5618 Telephone Road, Houston, Texas. Among the items seized was a total of \$603.00 in United States currency. The currency was seized from various areas of the brothel. In addition to the currency, officers also seized ledgers noting sex trafficking activities, boxes of unused condoms, and tickets used in the sex trafficking business. The following items were also present in the brothel during the search: small bottles/vials of personal lubricant, personal wipes, small rooms with bare mattresses on box springs, and used condoms on the floor in various areas. There were a number of illegal aliens working at the brothel on October 10, 2013.
10. On October 10, 2013, law enforcement also searched an apartment in Houston, Texas, where Alberto Mendez Flores (one of the managers of Las Palmas II/Nuevo Amanecer) and a prostitute, who Flores pimped at Las Palmas II, had been residing. Officers seized from the apartment a total of \$713.41 in United States currency along with several cell phones and two full boxes of condoms that were the same brand and quantity as the box of



condoms admitted into evidence as Exhibit 27, which one of the Las Palmas II employees had provided to law enforcement and which came from Las Palmas II.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed this 3<sup>rd</sup> day of June, 2015.

  
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Edwin Chapuseaux